

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF VERMONT**

In Re:

HERMITAGE INN REAL ESTATE
HOLDING COMPANY, LLC,

Chapter 7
Case No. 19-10214

Debtor.

**NOTICE OF JOINDER IN SUPPORT OF MOTIONS SEEKING TRANSFER OF
VENUE OF PENDING CHAPTER 11 CASES FROM THE UNITED STATES
BANKRUPTCY COURT FOR THE DISTRICT OF CONNECTICUT TO THE DISTRICT
OF VERMONT**

The Town of Wilmington (the “Town”), by and through their attorney, Edward G. Adrian, Esq., of Monaghan Safar Ducham PLLC, hereby files its Notice of Joinder in Support of Motions Seeking Transfer of Venue of Pending Chapter 11 Cases from the United States Bankruptcy Court for the District of Connecticut to the United States Bankruptcy Court of the District of Vermont, which motions were filed by the Petitioning Creditors [Doc. 28] and Barnstormer Summit Lift, LLC [Doc. 32] (together, “Venue Transfer Motions”). For the reasons advanced in the Venue Transfer Motions, transfer of the Chapter 11 cases pending in the District of Connecticut to the District of Vermont is in the interest of justice and the convenience of the parties.

The Town of Wilmington has a paramount interest in seeing all issues resolved by the Bankruptcy Court for the District of Vermont. In addition to the potential loss of jobs and tax revenue, depending on the length of these proceedings it is more than likely the outcome of this matter may substantially impact the Town’s operations and budgets. This Court also has deep experience in deciding matters where the Bankruptcy

proceedings have the potential to be impacted by Vermont law. Of particular interest to the case before the Court is the creation and impact of municipal tax liens regarding the real estate that forms the basis of these proceedings pursuant to Title 32 V.S.A., Chapter 133, Subchapter 8. This Court's knowledge and experience in adjudicating this and other Vermont Statutes impacting municipal corporations further serves the interests of justice and by extension, the residents of the Town.

WHEREFORE, the Town joins in and incorporates the arguments and statements contained in the Venue Transfer Motions as they relate to the potential for adverse impact on the Town and respectfully requests that the Venue Transfer Motions be granted.

Dated at Burlington, VT this 5th of June, 2019.

TOWN OF WILMINGTON

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